

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
EASTERN DIVISION**

SANDRA BYNAM,

Plaintiff,

Vs.

NATIONAL LLOYDS INSURANCE COMPANY,

Defendant.

No. _____

NOTICE OF REMOVAL

Comes now Defendant, National Lloyds Insurance Company, by and through the undersigned counsel, and hereby notify the Judges of the United States District Court for the Eastern District of Tennessee, Eastern Division; the Clerk of the Circuit Court of Knox County, Tennessee; and Plaintiff, Sandra Bynam, that the action described herein and filed in the Circuit Court of Knox County, Tennessee, is removed to the United States District Court for the Eastern District of Tennessee, Eastern Division pursuant to 28 U.S.C. §1441.

1. On April 6, 2016, Plaintiff filed a civil action in the Circuit Court of Knox County, Tennessee bearing Docket No. 1-167-16 against Defendant, National Lloyds Insurance Company. Service of the Complaint and Summons was made upon the designated statutory agent of the Defendant National Lloyds Insurance Company on April 12, 2016, by certified mail through the Commissioner of the Department of Commerce and Insurance of the State of Tennessee.

2. This action is filed by Plaintiff for proceeds allegedly due under a contract of insurance written by Defendant National Lloyds Insurance Company, and insuring Plaintiff's real property located at 2606 Martin Luther King, Jr. Avenue in Knoxville, Knox County, Tennessee

which was allegedly damaged when it was struck by an automobile on or about April 6, 2014.
(See Complaint)

3. Defendant seeks removal of this action to this Court upon the grounds that the controversy is wholly between citizens of different states and involves an amount in controversy which exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of the interest and costs. 28 U.S.C. §1332. Specifically, Plaintiff alleges in the Complaint she is entitled to a judgment of no more than \$100,000. (See Complaint).

4. Plaintiff is a citizen and resident of Knox County, Tennessee.

5. Defendant is a corporation, incorporated in Texas with its principle place of business located in Waco Texas.

7. The amount in controversy exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interest and costs.

8. This notice is filed within the time prescribed by 28 U.S.C. §1446(b).

9. A copy of the Summons and Complaint, being all the papers served upon the Defendant, are attached hereto.

WHEREFORE, notice is hereby given that the said civil action number 1-167-16 is removed from the Circuit Court of Knox County, Tennessee, to this Court.

Respectfully submitted,

RAINEY, KIZER, REVIERE & BELL, P.L.C.

By: s/ Keely N. Wilson
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Attorneys for Defendant,
National Lloyds Insurance Company

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of this pleading or document was served upon
counsel Plaintiff:

Glen B. Rutherford
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865/544-0550

by electronic service or by mailing postage prepaid or by delivery to the person or office of such
counsel.

This 28th day of April, 2016.

s/ Keely N. Wilson